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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 15, 1997

Mr. James Rasmussen
U. S. Department of Energy
P. O. Box 550, MSIN: H4-83
Richland, WA 99352



Dear Mr. Rasmussen:

Re: 105-DR, Large Sodium Fire Facility, and 100-D Ponds Dangerous Waste (DW)
Treatment, Storage, and Disposal Unit Inspections

The Washington State Department of Ecology (Ecology) has reviewed the U. S. Department of Energy's (USDOE) request for reduced frequency of DW inspections at the 105-DR Facility. Inspections are required, according to Washington Administrative Code 173-303-320, of all treatment, storage, and disposal units. This code states, "inspections need to be conducted often enough to identify problems before they can cause damage to human health or the environment."

The portions of 105-DR Unit accessible to personnel have been essentially clean closed, but still remain under controlled access. The remaining dangerous waste residue at the 105-DR Unit is in a solid, low toxicity form (sodium carbonate), enclosed inside the unit, not exposed to the environment, and located within areas inaccessible to personnel.

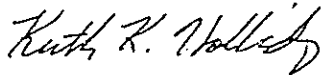
The 100-D Ponds is also in a current state which warrants reducing the frequency of inspections. As a result of USDOE's voluntary removal action, a need for controlled access is no longer needed. The potential for damage to human health and/or the environment from exposure to dangerous waste has been virtually eliminated. If dangerous waste remains at the 100-D Ponds Unit, it is at a depth well below intruder accessibility and where groundwater monitoring, not inspections, will identify a potential release.

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Ecology concurs the current inspection frequencies for these units are no longer necessary. Therefore, USDOE may change the frequency based on the probability of an incident occurring. As the Ecology project manager, I require an inspection of these units and their surroundings be performed once per year until the final closure certification is accepted by Ecology.

If you have any questions, please contact me at (509) 736-3036.

Sincerely,



Keith K. Holliday
100-D Area Project Manager
Nuclear Waste Program

KKH:skr

cc: Glenn Goldberg, USDOE
Mark Hahn, USDOE
Ellen Mattlin, USDOE
Fred Ruck III, FDHC
Jason Adler, RFSH
Jeff James, BHI
Mary Lou Blazek, ODOE
Tom Dillhoff, B&WHC
Administrative Record: 105-DR Facility ✓
100-D Ponds